## MOTION GRANTED.

THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

MICHAEL DAVID SILLS	)
and MARY SILLS,	)
	)
Plaintiffs,	)
	) CASE NO. 3:23-cv-00478
V.	
	) JUDGE WILLIAM L. CAMPBELL, JR
	) Magistrate Judge Chip Frensley
SOUTHERN BAPTIST CONVENTION	ON, )
et al.	) JURY TRIAL DEMANDED
	)
Defendants.	, )

## <u>DEFENDANT JENNIFER LYELL'S UNOPPOSED MOTION</u> FOR EXTENSION OF TIME TO RESPOND TO THE COMPLAINT

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule 6.01(a), Defendant Jennifer Lyell hereby files this Unopposed Motion for Extension of Time to Respond to the Complaint. In support of her motion, Ms. Lyell respectfully states:

- 1. On May 11, 2023, Plaintiffs filed their Complaint [Doc. 1] against Defendants. Ms. Lyell was served on May 16, 2023 [Doc. 29].
- 2. Under Federal Rule of Civil Procedure 12(a)(1), Defendant Lyell's initial response to the Complaint is due on June 6, 2023.
- 3. Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule 6.01(a), Defendant Lyell respectively requests that the Court extend her time to respond to the Complaint through June 30, 2023. Defendant and her counsel need additional time to properly respond to the Complaint in this cause. Ms. Lyell's counsel has contacted counsel for Plaintiffs, and Plaintiffs do

not oppose this motion. No other party is negatively impacted by the relief requested herein. It is understood that by seeking an extension of time, Defendant Lyell is not waiving any defense.

WHEREFORE, for good cause shown, Defendant Lyell respectfully requests that this Court extend her deadline to respond to the Complaint up to and including June 30, 2023.

Respectfully submitted,

## **NEAL & HARWELL, PLC**

By: /s/ Philip N. Elbert

Ronald G. Harris, BPR #009054 Philip N. Elbert, BPR #009430 Olivia R. Arboneaux, BPR #040225

1201 Demonbreun Street, Suite 1000 Nashville, Tennessee 37203 (615) 244-1713 – Phone (615) 726-0573 – Fax rharris@nealharwell.com pelbert@nealharwell.com oarboneaux@nealharwell.com

Counsel for Defendant Jennifer Lyell

## **CERTIFICATE OF SERVICE**

I hereby certify that on this the 2nd day of June, 2023, the foregoing was served via the court's electronic filing system and/or by email on the following counsel of record:

Gary E. Brewer BREWER AND TERRY, PC 1702 W. Andrew Johnson Hwy. P.O. Box 2046 Morristown, TN 37816 (423) 587-2730 – Phone

John W. ("Don") Barrett (pro hac vice)
Katherine Barrett Riley (pro hac vice)
BARRETT LAW GROUP, PA
P.O. Box 927
404 Court Square North
Lexington, MS 39095
(662) 834-2488 – Phone
(662) 834-2628 – Fax
dbarrett@barrettlawgroup.com
kbriley@barrettlawgroup.com

Shannon M. McNulty (pro hac vice) CLIFFORD LAW OFFICES, PC 120 N. LaSalle St., 36th Floor Chicago, IL 60602 (312) 899-9090 – Phone (312) 251-1160 – Fax smm@cliffordlaw.com

Counsel for Plaintiffs

George H. Cate, III
Kimberly M. Ingram-Hogan
BRADLEY ARANT BOULT CUMMINGS LLP
1600 Division St., Suite 700
Nashville, TN 37203
(615) 244-2582 – Phone
(615) 252-6380 – Fax
gcate@bradley.com
kingram@bradley.com

Counsel for Defendant LifeWay Christian Resources

John R. Jacobson Katharine R. Klein RILEY & JACOBSON, PLC 1906 West End Ave. Nashville, TN 37203 (615) 320-3700 – Phone (615) 320-3737 – Fax jjacobson@rjfirm.com kklein@rjfirm.com

Steven G. Mintz (pro hac vice)
Terence W. McCormick (pro hac vice)
MINTZ & GOLD LLP
600 Third Avenue, 25th Floor
New York, NY 10016
(212) 696-4848 – Phone
mintz@mintzandgold.com
mccormick@mintzandgold.com

Counsel for Defendants Guidepost Solutions LLC and SolutionPoint International, Inc.

L. Gino Marchetti, Jr.
Matthew C. Pietsch
TAYLOR, PIGUE, MARCHETTI & BLAIR, PLLC
2908 Poston Avenue
Nashville, TN 37203
(615) 320-3225 – Phone
(615) 320-3244 – Fax
gmarchetti@tpmblaw.com
matt@tpmblaw.com

Counsel for Defendants Southern Baptist Convention, Dr. Ed Litton, and Dr. Bart Barber R. Bruce Barze, Jr. (pending pro hac vice admission)
BARZE TAYLOR NOLES LOWTHER LLC
2204 Lakeshore Dr., Suite 425
Birmingham, AL 35209
(205) 872-1015 – Phone
bbarze@btnllaw.com

Counsel for Defendant Eric Geiger

/s/ Philip N. Elbert